

Message

---

**From:** Bromley, Eugene [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=17F71E77A97E4D82A6623E3063633135-EBROMLEY]  
**Sent:** 12/2/2019 10:34:06 PM  
**To:** Huckelbridge, Kate@Coastal [Kate.Huckelbridge@coastal.ca.gov]  
**CC:** Goldsmith, Sara [Goldsmith.Sara@epa.gov]; Chew, Sandra [Chew.Sandra@epa.gov]  
**Subject:** OCS Oil and Gas Permit  
**Attachments:** oil.grease.DMR.data4.xlsm; AO.Beta.Offshore.pdf; Beta.Offshore.2016.DMR.Excerpt.pdf; BetaDMRCoverLetterJuly-Sept16amended.pdf; dmrSubmission.Amendment.pdf; Platform Elly Offshore DMR Reporting 8-2016 thru 12-2019\_(002).pdf

Kate,

I am following up on two issues noted during our last call on October 29;

- 1) Difficulties in accessing OCS monitoring data – both NetDMR and even ECHO.
- 2) Effluent limits that may be below detection limits

Regarding #1 above, I have attached a file with downloaded monitoring data from ECHO for that last 5 years for oil and grease in produced water – which could be considered the permit's most important effluent limit. Generally good compliance has been reported – noncompliance shown in red. One conspicuous non-compliance (Platform Elly – August 2016) led to an administrative order (attached with other explanatory info).

Our data management department has also offered to provide you (if requested) with monitoring reports in a format that may be clearer – I attached an example.

Regarding #2 above, this may not be a problem after all. The draft permit requires “sufficiently sensitive” test methods in accordance with the new 2014 regulations. These regulations require a test method with a minimum level (ML) (level at which the parameter can be reliably measured) less than the effluent limit or at least the most sensitive approved method. Even for the lowest of the new effluent limits such as benzo (a) pyrene which are quite low, there appears to be a test method that could measure it:

Benzo(a) pyrene effluent limit – 0.00000013 mg/l (or 0.00013 ug/l) (post dilution, monthly ave)  
End-of-pipe effluent limit where sample is taken (including typical dilution of 1,000 to 1) – 0.13 ug/l  
Last resort test method (selected ion monitoring) – ML of 0.1 ug/l

From our last call, I believe you were planning on sending us a letter describing what you would like to see in the permit to recommend concurrence to the Commission itself. Can you let us know where that stands?

Thanks

Eugene Bromley  
NPDES Permits Section (WTR-2-3)  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
[bromley.eugene@epa.gov](mailto:bromley.eugene@epa.gov)  
(415) 972-3510  
(415) 947-3549 (fax)